

To: Glastir.stocktake@wales.gsi.gov.uk Date: 25 4 12  
Ref:  
Circulation: Contact: Dylan Morgan  
Tel:  
Fax:  
Email: Dylan.morgan@nfu.org.uk

### Glastir Stocktake – NFU Cymru Comments

Thank you for the invite to the Glastir stocktake workshop on the 2<sup>nd</sup> April 2012 at the WG Pavilion, Royal Welsh Showground. As a follow up to that workshop you invited stakeholders to submit written comments to the Glastir Stocktake exercise. I attach a summary of some of the key areas that NFU Cymru believes need to be considered and addressed as part of this stocktake of the implementation and application processes of the Glastir Scheme.

#### Application Process

**Application Maps** – The way maps are issued to farmers is very confusing in terms of the number of maps issued (compared to SAF), the fact that different map sheets are to different scales and that there is overlap with the same field on different maps but often to a different scale.

**Scorecards** – For those who are computer literate the scorecards work very well and significantly help to simplify the application process. However, it is important that farmers / agents are made aware when new versions become available. Dialogue boxes must not obscure data inputted.

**Application Window** – There is a need to try to extend the time period for applications. This year the application period coincides with a very busy time of year (lambing) and for the majority of farmers who require professional assistance the tight application period mirrors closely the SAF period which means that advisers struggle to cope with the additional workload. Consideration should be given to opening the application window on the 1<sup>st</sup> January each year.

**Application Interviews** – Farmers are being requested to travel long distances to attend Glastir interviews (up to 2 hours has been reported to us). The technology should be available at local WG offices to run Glastir interviews on specific dates and not just at the divisional office.

**Guidance Notes** – We recognise that the 2013 guidance is shorter and more concise than the 2012 version but further work is needed to ensure that is easily understandable and that farmers are not put off by the sheer weight and size of the envelope that falls through their letterbox. Whilst we understand and agree that farmers need to be fully

aware of their obligations before entering the scheme we believe that the guidance notes should be looked at once again and fit into the principles of the working smarter programme.

**Stocking activity / diary** – This is a major concern to NFU Cymru. We question how many farmers who have signed up to the Glastir AWE in 2012 are fully aware of exactly how onerous this activity diary is to complete. There is an urgent need to review the information required within the activity diary. We question why the diary is needed for land not under specific prescriptions and also for land where the prescriptions specifically state the sward heights required why then is there also a need to record stocking densities. A full and thorough review is needed of what exactly is required to satisfy the EU commission and what is the easiest and simplest way of a farmer recording the necessary information.

**Regional Packages** – Given that only 9 farmers have made use of the package in 2012, we believe to simplify the guidance notes and the application process there is a strong argument to remove these packages from Glastir AWE.

**Contract literature** – This is very long and detailed, so much so that we question how many farmers who have signed contracts will have read the minor detail. We would suggest that this needs to be re-visited.

**Complexity** – A significant proportion of farmers have had to rely on professional assistance to complete the application process, it is our belief that the AWE as an entry level scheme should be designed in such a way that a farmer should in most circumstances be able to complete without needing to rely on outside assistance. As part of this stocktake and review of the application process and implementation of Glastir we hope that the revised guidance and application process can be ‘road tested’ with a cross section of farmers ahead of implementation.

## Prescriptions

**Habitats** -There is a need to re-consider whether ‘current’ habitats and their maintenance can be better recognised through the points system rather than the continuous pressure to ‘create’ habitat. Farmers feel that the Glastir AWE is all about taking productive land out of agricultural production. Greater recognition for wildlife habitats already on farm and allowing some options on semi-improved land or un-improved land e.g. ponds, wildlife corridors, streamside corridors would help to change the current perception of the scheme.

**Stocking rate on open Country (Option 41)** - stocking rates make it extremely difficult and unviable for hill and upland farmers to enter. This needs to be re-considered.

**Traditional Farm Boundaries** – There should be prescriptions for stone walls / traditional boundaries to help those areas of Wales where hedges won’t grow or would not blend in to the landscape. Farms without hedges are very limited with regards to the prescriptions available to them.

**Planting Trees** - Given the size of fields in Wales it is not practical or feasible to have as a condition (options 11,12 +13) that trees have to be planted more than 10m from a

hedge. Some traditional Orchards would not be able to even accommodate the planting of one tree under this condition.

**Educational Access** – Farmers have flagged up to us the benefits they have seen from promoting educational access visits through Tir Gofal and have questioned why these are not included within Glastir AWE.

**Part Farm Scheme** – NFU Cymru believe that consideration should be given to allowing farmers to enter Glastir on a Part Farm Basis. We believe that this approach would very much help with achievement of WFD targets. For example with the right financial support under Glastir a number of more intensive holdings who have not currently considered Glastir as an option would re-consider if the scheme was restricted to land adjoining water courses and not the whole farm.

**Completion of Capital Works** – Farmers tell us that allowing completion of capital works to take place by the end of Year 3 of the scheme would help with managing the completion of the work and aid cash flow.

## General Issues

**Interaction between AWE + TE** – There needs to be greater connectivity between the AWE and TE so farmers have some idea of the likelihood of getting into the targeted element before they sign up to the AWE.

**ELS / HLS / UELS** – It is our understanding that the implementation of the new suite of agri environment schemes in England seems has taken place with far less complication than in Wales. We believe that a review and comparison between Glastir AWE and ELS / UELS should form part of this stocktake exercise.

**Rees Roberts Review** - Whilst we accept statements made by WG that this stocktake is not 'Rees Roberts 2' we believe that WG should re-consider the recommendations made by the group with a view to implementing some of the recommendations that for various reasons were not taken forward by the previous Government. Re-evaluating the environment benefits of high sugar grasses and a prescription for minimum tillage, as well as more flexible dates for arable operations within current operations are some initial thoughts on areas that need revisiting. We believe that management of scrub needs a 'points' recognition within the AWE as well as being part of Targeted Element.

**ACRES**- Whilst we welcome the fact that funds that had originally been allocated for AWE will now hopefully be used by industry through the ACRES grant scheme the reality is that it will not be possible for a significant proportion of farmers to complete the application process, get planning, secure capital and finish the project by the end of the year as the current scheme rules stipulate. The timescales for completion of the work urgently need to be reviewed. The application process needs to be simplified to give farmers the opportunity to complete the process themselves and not to have to rely on professional assistance that can run too many hundreds of pounds.

**Common land** – Whilst WG note that over 30% of Common land is now under Glastir agreement compared with 2% under previous agri-environment schemes, it is important

also to note that very close to 100% of Common land will currently be under Tir Mynydd 'agreement' so there is the potential for a substantial loss in income terms to common rights holders unless this can be rectified. It must also be remembered that currently through the help and support offered by Common land officers there is a significant level of 'hand holding' on offer to secure agreement. With this support available only for a short term period there is a need to ensure that the process is simplified in future. Given the diversity of commons in Wales in terms of land area, rights holders, historic practice and the very real problems encountered in trying to secure agreements on the larger commons perhaps a "one rule fits all approach for commons" needs to be revisited.

**Dairy Farmers and Glastir-** There is increasing pressure from milk buyers for their producers to be part of an agri- environment scheme. Ideally we want this scheme to be Glastir AWE rather than the industry in Wales being forced into a position where, to meet buyer demands, there would have to be consideration of instigating a separate private environment assurance type scheme. We welcome the recent announcement that the slurry injection prescription can now be used to help achieve the reduced points entry but there is a continuing need to specifically address the problems that dairy farmers have with accessing Glastir AWE. Implementation of many of the recommendations we have made in this submission would we believe go some way to achieving that aim but there may also be merit in specifically looking at a number of intensive dairy farms to see how the scheme can be made more attractive to dairy farmers.

**Communication –** As was highlighted at the workshop on the 2<sup>nd</sup> April the biggest selling point to get farmers joining Glastir will be reports of positive experiences from farmers who are currently in the scheme.

In terms of general communication it is important that all literature is in a simple to read format as possible. Farmers want to have confidence that they can apply to the scheme and adhere to scheme conditions without an excessive amount of extra bureaucracy or having to rely unduly on professional assistance. Some farmers who attended Glastir on farm meetings were put off when those running the course were unsure of some of the scheme rules or there was disagreement between technical staff over what was classed as habitat. Farmers felt if those implementing the scheme were unsure of the rules / what habitat land is etc. what hope did they have of working within the scheme. This again highlights the need to ensure that the AWE is a simple to understand entry level agri-environment scheme.

It is important that the information on the WG website is up to date, easy to use and easy to find, these have all been issues where there have been problems in the past. A current example of this is the Glastir Stocktake exercise. Despite the WG press release of the 7<sup>th</sup> March announcing the stocktake together with the establishment of an e-mail address and postal address to allow as many people as possible to express their views, the e-mail address, postbox and deadline for replies is not easily accessible on the WG website ( it is contained within the Gwlad section) and cannot be found when using the WG search engine.

**Glastir / LFA support –** It would be remiss of NFU Cymru if we did not use this stocktake exercise to highlight once again our concern that the Welsh Government has made the decision not to provide specific support for farmers in the LFA areas of Wales. It remains our firm view that the Welsh Government should make use of the opportunity it has under EU Pillar 2 measures to provide compensatory allowance to help offset the effects of farming in areas of permanent handicap.

If you require any further information of clarity on any of the issues highlighted above then please do not hesitate to contact me. NFU Cymru looks forward to further constructive and positive meetings like the workshop that took place on the 2<sup>nd</sup> April so that Glastir can be transformed into a scheme that delivers for both farmers and for Government in Wales.

\*\*\*ENDS\*\*\*